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October 16, 2023

United State District Court – District of New Jersey
The Honorable Jose R. Almonte, USMJ
Frank R. Lautenberg U.S. Post Office & Courthouse Building
2 Federal Square
Newark, NJ 07102

RE: Tyrone Ellison vs. State of New Jersey, et al.
Civil No.: 2:22-cv-05001-BRM-JRA
Request for Discovery Extension

Your Honor:

Pursuant to your Order dated October 23, 2023, please allow this letter to serve as a Request for a 60 Day Discovery Extension. I have spoken to Ms. Kristol regarding this request and she consents to my request for a 60 day extension on Fact Discovery (March of 2024), Affirmative Expert Reports (April of 2024), Responding Expert Reports (May of 2024) and Expert Discovery (June of 2024).

Plaintiff Ellison's deposition took place on November 21, 2021 and the Defendants/Fact witness are scheduled for January 30/31.

Thank you for your consideration.

Very truly yours,


JONATHAN R. IVANS, ESQUIRE

JRI/tp
cc: Rachel Kristol, Esquire